

G&G ROCKY FLATS

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July 21, 1993

S. R. Grace
Environmental Restoration Division
DOE, RFO

SITEWIDE TREATABILITY STUDIES MEETING NOTES - TCG-149-93

Please find attached a summary of the discussions concerning the sitewide treatability studies from the meeting held on July 15, 1993 between the Department of Energy/ Rocky Flats Office, the Environmental Protection Agency, the Colorado Department of Health and EG&G Rocky Flats, Inc. Included are copies of the meeting notes for transmittal to the attendees from the agencies.

If you have any questions or comments please call M. J. Harris at X6958.

T. C. Greengard
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Manager

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Environmental Engineering & Technology

TCG:œt

Orig. and 1 cc - S. R. Grace

Attachment:
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VANSON, E.R.		
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LIAMS, S. (ORC)		
LSON, J.M.		
NE, J. O.		
Black, C	X	X
Carroll, T.C.	X	X
Curry, M.J.	X	X
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Farmer, J. W.	X	X
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SITEWIDE TREATABILITY STUDIES MEETING
July 15, 1993

The meeting was held at Interlocken, beginning at 1:00 p.m. Attendees included:

A. Duran	EPA	O. Erlich	EG&G
J. Swanson	CDH	T. C. Greengard	EG&G
D. Norbury	CDH	M. J. Harris	EG&G
P. Singh	DOE	W. J. Roushey	EG&G
S. R. Grace	DOE	M. C. Rupert	EG&G

The following is a summary of the items discussed during the meeting.

- I. Whether the EPA SITE Demo was being conducted under RCRA or CERCLA was discussed. EPA stated that the demo was being conducted under CERCLA and certain RCRA requirements did not apply to this project. In particular, RCRA limits the amount of material to be used in a treatability study to 1000 kg. This restriction will not apply to the SITE demo.
- II. The direction of the Site Wide Treatability Studies program and how to structure the studies was discussed. The approved Final Treatability Studies Plan (FTSP, August 1991) calls for the sitewide program to be done at the screening level. However, Section XI in the IAG, which authorizes the site wide program, also allows EPA to order DOE/EG&G to do additional studies as necessary. Under this language EPA is suggesting that the more detailed remedy-selection studies will be required. DOE has requested that EPA send a letter to DOE describing the desired changes in the treatability studies program. These changes will be a modification to the scope of the current site wide program and may have cost and schedule impacts on the work package for FY 94.
- III. The outline in Chapter 6, entitled, "Procedures for Preparation of the Treatability Study Work Plans" from the Final Treatability Studies Plan was reviewed section by section with EPA and CDH providing comments on how they expected each section to be implemented when preparing a work plan. In essence, EPA suggested that the work plan documentation could be reduced by:
 - 1) not including detailed discussions of items like plant history, setting and location;
 - 2) omitting sections like the field sampling plan and health and safety plan, etc., which would be produced as separate documents and only referenced in the treatability study plan.
- IV. Data Quality Objectives and the required DQO levels for remedy-screening and remedy-selection studies were discussed. EPA and CDH expressed that a mixed approach would be acceptable. This approach allows the early test work to be analyzed at the lower DQO levels of II and III, thereby saving time and money. Final analyses for process optimization work or for designated critical components would be required to be analyzed at level IV.
- V. EPA requested that firm schedules including specific dates for 1) starting test work, 2) completing test work and 3) writing reports be developed for each treatability study. EG&G suggested that firm schedules could not be developed without a commitment from the agencies to review and comment on draft documents in a reasonable, agreed upon amount of time. Several ideas were discussed with the most acceptable being the idea of "starting the clock at zero" when the agency comments were completed and building the schedule from that point. The schedule presented in Figure 7-2 of the FTSP was reviewed and EG&G and DOE agreed to review the task durations in detail and develop a proposal to modify them as necessary based on recent experience. The modified Figure 7-2 will constitute the basis of further schedule discussions with the agencies.

Commitments:

EG&G and DOE to review Figure 7-2 in the FTSP and modify as required. This modified table will be the basis of the next discussion on scheduling.